

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No.

19-34574-KRH

Chapter

7

**NOTICE OF MOTION AND EXPEDITED HEARING REQUEST**

**PLEASE TAKE NOTICE** that Lynn L. Tavenner, Trustee, not individually, but solely in her capacity as the Chapter 7 trustee (in such capacity, the “**Trustee**”) of the bankruptcy estate (the “**Estate**”) of LeClairRyan PLLC (“**LeClairRyan**” and/or the “**Debtor**”), in the above-referenced Chapter 7 case (the “**Case**”) has filed the Motion for Approval of Compromise and Settlement and Memorandum of Law (the “**Motion**”). The Trustee has also filed the Motion to Expedite Hearing on Trustee’s Motion (the “**Motion to Expedite**”). Copies of the Motion and the Motion to Expedite are being served herewith.

**PLEASE TAKE FURTHER NOTICE** that your rights may be affected. You should read the Motion and Motion to Expedite carefully and discuss them with your attorney if you have one in this chapter 7 Case. (If you do not have an attorney, you may wish to consult one).

**PLEASE TAKE FURTHER NOTICE** on September 4, 2019, the Court entered the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [ECF. No. 38] (the “**Case Management Order**”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “**Case Management Procedures**”). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

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be conducted. A copy of the Case Management Order may be obtained, free of charge, by written request to [pberan@tb-lawfirm.com](mailto:pberan@tb-lawfirm.com) or, for a fee, at <https://ecf.vaeb.uscourts.gov>.

**PLEASE TAKE FURTHER NOTICE** if you do not want the Court to grant the relief requested in the Motion to Expedite, or if you want the Court to consider your views on the Motion, on or before November 28, 2021, (the “**Objection Deadline**”), you or your attorney must file and serve an objection consistent with the Case Management Order.

**PLEASE TAKE FURTHER NOTICE THAT** the Court will entertain the Motion to Expedite, and if granted, the Motion, on November 29, 2021, at 1:00 p.m. (or such time thereafter as the matter may be heard). In connection with the same, the undersigned will appear before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond, Virginia 23219. **REMOTE HEARING INFORMATION: Due to the COVID-19 public health emergency, no in-person hearings are being held. This hearing will take place remotely through Zoom. To appear at the hearing, you must use the following Zoom registration link:**

[https://www.zoomgov.com/meeting/register/vJItduGtqD4vEosmFwPims\\_wqKOMkhqI8v0](https://www.zoomgov.com/meeting/register/vJItduGtqD4vEosmFwPims_wqKOMkhqI8v0)

Listen-only conference line:

Dial: 1-866-590-5055

Access Code: 4377075

Security Code: 112921

PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence the parties wish to present at the hearing must be filed with the Court in advance of the hearing.

**PLEASE TAKE FURTHER NOTICE THAT** any party desiring to object the Motion or otherwise be heard with respect to the same shall also appear and be heard at such time.

**PLEASE GOVERN YOURSELVES ACCORDINGLY.**

DATED: November 19, 2021

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

/s/ Erika L. Morabito

Erika L. Morabito (VSB No. 44369)

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*Special Counsel to Lynn L. Tavenner, Chapter 7  
Trustee*

**CERTIFICATE OF SERVICE**

Pursuant to the Local Rules of this Court and the Case Management Order, I certify that on this 19<sup>th</sup> day of November 2019, a true copy of the foregoing Notice was sent first-class delivery, postage prepaid, and/or electronically to: (a) the Office of the United States Trustee; (b) the Debtor's 20 Largest Unsecured Creditors; (c) all known secured creditors from the Debtor's Official Form 106D; (d) the Core Parties and 2002 List as defined in the Case Management Order; (e) all Persons identified by name in the Motion; (f) all Persons listed on the Debtor's List of Equity Security Holders; (g) all other Persons receiving a demand from the Trustee pursuant to the FAO Procedures Order (as defined in the Motion); and (h) parties requesting service of pleadings in this Case (as indicated on the Schedule A attached to the Court filed copy), as well as Persons receiving ECF notices in this Case.

/s/ Erika L. Morabito

Erika L. Morabito